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October 21, 2010

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Attn: Chief, Wireline Competition Bureau, Competition Policy Division

Re: *Domestic Section 214 Application Filed for the Transfer of Control of Q-Comm Corporation to Windstream Corporation*
WC Docket No. 10-169

Dear Ms. Dortch:

Pursuant to section 63.50 of the Commission's rules, 47 C.F.R. § 63.50, and at the request of Wireline Competition Bureau staff, Windstream Corporation ("Windstream") and Q-Comm Corporation ("Q-Comm") (together "Applicants") hereby provide supplemental information to further explain Windstream's acquisition of Q-Comm.

As the Applicants stated in the joint application, the services that they provide and network facilities they have deployed are "complementary and the combination of the two entities will serve to enhance the combined companies' ability to offer a complete end-to-end service." Application at 10. The attached map illustrates the complementary nature of the Applicants' facilities, which will more than double Windstream's existing fiber footprint – adding over 30,000 fiber route miles contiguous to Windstream's service areas. Absent this transaction, Windstream does not have any plans to replicate the state-of-the-art long haul transport network that Q-Comm has already built – doing so would be a very complex, expensive, and uneconomic undertaking.

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Page 2

Please contact the undersigned if you have questions or need additional information.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By: /s/ Kenneth D. Patrich
Kenneth D. Patrich
Mark A. Walker

Attachment

cc: William Dever (WCB)
Jodie Donovan-May (WCB)
Eric N. Einhorn (Windstream)
Edward Cadieux (Windstream)
John Chuang (Q-Comm)
Jean L. Kiddoo (Bingham/Q-Comm)

ATTACHMENT – MAP OF COMBINED WINDSTREAM AND Q-COMM FACILITIES

